

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Amendments to
Rules of Practice

Docket No. RM2020-7

PUBLIC REPRESENTATIVE THIRD MOTION
FOR ISSUANCE OF INFORMATION REQUEST

(May 4, 2020)

Pursuant to 39 C.F.R. § 3001.21(a) and 39 C.F.R. § 3007.3(c), the Public Representative requests in this Third Motion that an Information Request be issued to obtain additional clarifying data and information from the Postal Service concerning a methodology to update city carrier cost attribution to account for recent volume trends, labeled as Proposal Two.¹

The Public Representative proposes the following questions for the Postal Service.

1. Please refer to the Postal Service's Response to CHIR No. 2, question 1.c, filed April 27, 2020, which states:

[t]he regular delivery time equation has four delivery volumes (DPS mail, cased Mail, sequenced mail and FSS mail) and one collection volume (volume collected from customer receptacles). All five variables are potentially relevant for updating the delivery time variabilities. However, only the delivery volumes are included in the Postal Service's **operational** databases, the collection volume is not (emphasis added). As a result, there are no more recent collection volumes that could be used in the update and the CCSTS collection volumes are used (footnote omitted)."

¹ Petition of the United States Postal Service for the Initiation of a Proceeding to Consider Proposed Changes in Analytical Principles (Proposal Two), April 7, 2020. (Petition).

- a. Please confirm that the reason annual collection volumes available from the CCCS are not utilized to update the mean of collection mail is because the Postal Service does not consider the collection volumes utilized in the RM2015-7 CCSTS to be operational data.
- b. If you do not confirm, please explain the reason the mean volume of collection mail was not updated by adding 2019 CCCS collection volumes to regular delivery volumes to obtain shares of both regular delivery and collection mail, which would have allowed the Postal Service to also update the mean value of collection mail using the proposed “relative share method” (whereby the relative shares of mail shapes using 2019 CCCS relative volumes per mail shape are multiplied by the mean value of that shape from the CCSTS data used in the regular delivery model in RM2015-7, filed December 11, 2014).

Respectfully Submitted,

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